

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

PAT CASON-MERENDA and JEFFREY A.
SUHRE on behalf of themselves and others
similarly situated,

Case No. 06-15601

Plaintiffs,

Hon. Gerald E. Rosen

v.

Magistrate: Donald A. Scheer

DETROIT MEDICAL CENTER, HENRY
FORD HEALTH SYSTEM, MOUNT
CLEMENS GENERAL HOSPITAL, INC., ST.
JOHN'S HEALTH, OAKWOOD
HEALTHCARE, INC., BON SECOURS
COTTAGE HEALTH SERVICES, WILLIAM
BEAUMONT HOSPITAL d.b.a. BEAUMONT
HOSPITALS, and TRINITY HEALTH CORP.,

Defendants.

**MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL PURSUANT TO
PROTECTIVE ORDER**

Plaintiffs respectfully request leave of the Court to file the following motions and
accompanying exhibits, where applicable, under seal:

- **Plaintiffs' Memorandum in Opposition to Certain Defendants' Motion to Defer Consideration of Plaintiffs' Motion for Preliminary Approval of Settlement with Oakwood**
- **Declaration of Raymond J. Farrow in Support of Plaintiffs' Opposition to Motion to Defer Consideration of Plaintiffs' Motion for Preliminary Approval of Settlement**

PLAINTIFFS' MOTION FOR LEAVE
TO DOCUMENTS UNDER SEAL PURSUANT
TO PROTECTIVE ORDER

LAW OFFICES OF
KELLER ROHRBACK L.L.P.
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with Oakwood

These motions reference and/or attach documents designated as confidential by the Defendants. Pursuant to Section 3 of the Stipulation and Protective Order Governing the Production and Exchange of Confidential Information (“Protective Order”), these materials are to be filed under seal. Public, redacted copies will be filed as required by ¶ 3 of the Protective Order.

Plaintiffs file this Motion under Local Rule 5.3(b) seeking leave of Court for sealing these filings. Plaintiffs request that these documents be maintained under seal until such time as the Court has ruled on this Motion. A proposed order is submitted herewith.

DATED this 29th day of June, 2009.

KELLER ROHRBACK L.L.P.

By s/ Raymond J. Farrow

Mark A. Griffin

Raymond J. Farrow

Lorraine Lewis Phillips

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Attorneys for Plaintiffs

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2009 I served the attached document(s) on the parties listed below as indicated:

Via ECF:

Alethea A. Wilson
Sandra D. Hauser
David L. Hanselman, Jr.
Gouri G. Sashital
Jill L. Marr
Corey M. Shapiro
Shari Ross Lahlou
David A. Hardesty
Toby G. Singer
Sheldon H. Klein
David B. Gunsberg

Charles N. Raimi
Amy J. Carletti
Stephen Y. Wu
David A. Ettinger
Margo Weinstein
Howard B. Iwrey
Bethany M. Wimsatt
Bruce L. Sendek
Michael R. Turco
Cathrine F. Wenger

Patricia C. Schabath
David Marx, Jr.
Terrence J. Miglio
Peter E. Boivin
Christopher Q. King
Fred K. Herrmann
Thomas M.J. Hathaway
Michael R. Shumaker
Mark T. Nelson

s/ Raymond J. Farrow
Raymond J. Farrow

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